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**DIGEST OF OTHER RECENT VIRGINIA DECISIONS.****Supreme Court of Appeals.**

**Note.**—In this department we give the syllabus of every case decided by the Virginia Supreme Court of Appeals, except of such cases as are reported in full.

**FIRST NAT BANK OF LOUISA v. ANDERSON.**

June 12, 1919.

[99 S. E. 561.]

**Bills and Notes (§ 422 (1)\*—Notice of Protest—Waiver.**—Director, who indorsed note of company, held, by his conduct in admitting liability and authorizing and suggesting a plan of settlement, to have waived notice of protest, under Code 1904, § 2841a, subsec. 109.

[Ed. Note.—For other cases, see 2 Va.-W. Va. Enc. Dig. 459.]

Error to Law and Equity Court of City of Richmond.

Action by the First National Bank of Louisa against John T. Anderson and others. From judgment for defendant named, plaintiff brings error. Reversed.

*W. Worth Smith, Jr., of Louisa, and T. J. Moore and M. J. Fulton*, both of Richmond, for plaintiff in error.

*H. W. Goodwyn*, of Richmond, for defendant in error.

**KARNES v. COMMONWEALTH.**

June 18, 1919.

[99 S. E. 562.]

**1. Jury (§ 117\*)—Objection to Panel—Time—“Impaneled.”**—Under Code 1904, § 4018, defendant's objection that the jury was illegally constituted and selected, not being made until after the jury was “impaneled,” that is selected, found free from exceptions, and duly sworn, was properly overruled; it not appearing that the irregularity was intentional, or such as probably to cause injustice.

[Ed. Note.—For other definitions, see Words and Phrases, First and Second Series, Impanel. For other cases, see 9 Va.-W. Va. Enc. Dig. 47.]

**2. Criminal Law (§§ 1035 (6), 1144 (8)\*—Jury (§ 58\*)—Objections—Presumption.**—While the statutes with reference to the sum-

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\*For other cases see same topic and KEY-NUMBER in all Key-Numbered Digests and Indexes.